

KAMERMAN, UNCYK, SONIKER & KLEIN P.C.  
COUNSELORS AT LAW  
1700 BROADWAY, 16<sup>TH</sup> FLOOR  
NEW YORK, NEW YORK 10019

(212) 400-4930

June 25, 2025

Hon. Margo K. Brodie, U.S.D.J.  
United States District Court for the Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11021

**By electronic filing**

**RE: Mercante v. Tarzia, 24-cv-08471**

Dear Judge Brodie:

Our firm, with co-counsel, represents Plaintiff in the case above. Per this Court's scheduling order, we are due to serve our response to the motion to dismiss (Doc. 18) previously served upon us on June 30, 2025. We require an extension of time to do so.

This is our first request for an extension of time. The request is unopposed, as stated by opposing counsel via e-mail on June 23, 2025.

We are requesting a two-week extension of our deadline, until July 14, 2025. This would necessarily enlarge Defendant's deadline to serve any responsive documents on us until July 27, 2025.

This extension is necessary due to drafting counsel's illness the week before which prevented work upon the case.

As always, the parties thank the Court for its time and consideration.

Respectfully submitted,

/s/ Lane A. Haygood

Lane A. Haygood

[lhaygood@kusklaw.com](mailto:lhaygood@kusklaw.com)

Don McGowan

[dmcgowan@kusklaw.com](mailto:dmcgowan@kusklaw.com)

KAMERMAN, UNCYK, SONIKER &  
KLEIN, P.C.

1700 Broadway, 16th Floor  
New York, New York 10119

cc:

All relevant parties by electronic filing.